

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:

Julian Christian Brown, III

Debtor(s).

CASE NO: 11-06026-dd
Chapter 13

NOTICE AND APPLICATION FOR SALE
OF PROPERTY FREE AND CLEAR OF
LIENS

TO: All Creditors and Parties in Interest

YOU ARE HEREBY NOTIFIED that the Debtor is applying for approval to sell the property of the Debtor's estate described below free and clear of all liens and encumbrances according to the terms and conditions stated below.

TAKE FURTHER NOTICE that any response, return, and/or objection to this application, should be filed with the Court no later than 21 days from service of the application and a copy simultaneously served on all parties in interest.

TAKE FURTHER NOTICE that no hearing will be held on this application unless a response, return and/or objection is timely filed and served, in which case, the Court will conduct a hearing on December 19, 2011 at 10:00 a.m., at J. Bratton Davis United States Bankruptcy Court, 1100 Laurel Street, Columbia South Carolina. No further notice of this hearing will be given.

TYPE OF SALE: private

PROPERTY TO BE SOLD: 2005 Bentley Continental; VIN SCBCR63W45CO29466;

PRICE: an amount to exceed the estimated loan amount, believed to be approximately \$65,000
and the broker fee

APPRAISAL VALUE: Debtor believes property is worth at least \$70,000. NADA values the vehicle between \$74,200 and \$99,900.

BUYER: unknown party; dealer will market property and obtain a purchaser

PLACE AND TIME OF SALE: to be determined upon receipt of court order

SALES AGENT/AUCTIONEER/BROKER: Lamborghini Miami, 14800 Biscayne Blvd, North Miami Beach, FL 33181

COMPENSATION TO SALES AGENT/AUCTIONEER/BROKER/ETC.: 5% of the sales price (which is \$3,250 for a \$65,000 sale price)

ESTIMATED TRUSTEE'S COMPENSATION: unknown

LIENS/MORTGAGES/SECURITY INTERESTS ENCUMBERING PROPERTY: BB&T – approximately \$65,000; upon information and belief, BB&T consents to the sale

DEBTOR'S EXEMPTION: none

PROCEEDS ESTIMATED TO BE PAID TO ESTATE: any excess from the sale; this is a 100% plan, which is why Debtor prefers selling the vehicle over surrendering it at a potential loss at auction, and proceeds will be used to pay creditors

STAY OF ORDER: none

Applicant is informed and believes that it would be in the best interest of the estate to sell said property by private sale. Applicant also believes that the funds to be recovered for the estate from the sale of said property justify its sale and the filing of this application.

The Court may consider additional offers at any hearing held on this notice and application for sale. The Court may order at any hearing that the property be sold to another party on equivalent or more favorable terms.

The trustee or Debtor in possession, as applicable, may seek appropriate sanctions or other similar relief against any party filing a spurious objection to this notice and application.

WHEREFORE, applicant requests the Court issue an order authorizing sale of said property and such other and further relief as may be proper.

MOORE, TAYLOR & THOMAS, P.A.

By: /s/ Jane H. Downey
Jane H. Downey, ID 5242
Post Office Box 5709
1700 Sunset Boulevard
West Columbia, SC 29171
(803) 929-0030

Attorney for Debtor(s)

November 10, 2011

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:) Case No.:
Julian Christian Brown, III) Chapter 13
Debtor(s).) CERTIFICATE OF SERVICE
_____))

I, the undersigned attorney for the Debtor(s) do hereby certify that I have served a copy of the pleading(s) hereinbelow specified by mailing a copy of the same today by United States Mail, postage prepaid, to the following address(es):

Pleadings: Notice And Application For Sale of Property Free and Clear of Liens
Proposed Order

Parties Served: Mailing Matrix Attached

MOORE, TAYLOR & THOMAS, P.A.

By: /s/ Jane H. Downey
Jane H. Downey, ID 5242
Post Office Box 5709
1700 Sunset Boulevard
West Columbia, SC 29171
(803) 929-0030

Attorney for Debtor(s)

November 10, 2011

Label Matrix for local noticing
0420-3
Case 11-06026-dd
District of South Carolina
Columbia
Thu Nov 10 08:52:12 EST 2011

All Points Capital Corp
PO Box 3071
Hicksville NY 11802-3071

American InfoSource LP as agent for
First Data Global Leasing
PO Box 248838
Oklahoma City, OK 73124-8838

Julian Christian Brown III
4443 Bethel Church Rd #57
Columbia, SC 29206-1265

Jane H. Downey
Moore Taylor & Thomas PA
1700 Sunset Blvd
PO Box 5709
West Columbia, SC 29171-5709

Harley Davidson Financial
222 W Adams
Chicago IL 60606-5312

IRS - US Attorney
J. Douglas Barnett, AUSA
1441 Main Street
Suite 500
Columbia, SC 29201-2897

Knotty Headz Enterprises, LLC
209 S. Beltline Blvd
Columbia SC 29205-4201

Recovery Management Systems Corporation
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

(p)WACHOVIA DEALER SERVICES INC
BK DEPARTMENT
PO BOX 19657
IRVINE CA 92623-9657

(p)AMERICAN HONDA FINANCE
P O BOX 168088
IRVING TX 75016-8088

Ally Financial
P.O. Box 130424
Roseville, MN 55113-0004

(p)BB AND T
PO BOX 1847
WILSON NC 27894-1847

Citimortgage Inc
Po Box 9438
Gaithersburg MD 20898-9438

Joy S. Goodwin
1813 Laurel Street
Columbia, SC 29201-2626

Harley-Davidson Credit Corp
P. O. Box 829009
Dallas, Texas 75382-9009

Internal Revenue Service
PO Box 7346
Philadelphia PA 19101-7346

Elizabeth R. Polk
Scott Law Firm
PO Box 2065
Columbia, SC 29202-2065

South Carolina Department of Revenue
Attn: Bankruptcy Department
PO Box 125
Columbia SC 29202-0125

Wells Fargo Dealer Services, Inc.
PO Box 19657
Irvine, CA 92623-9657

ASSET ACCEPTANCE LLC
PO BOX 2036
WARREN MI 48090-2036

Ally Financial
PO Box 380902
Minneapolis MN 55438-0902

John Douglas Barnett
U.S. Attorney's Office
1441 Main St #500
Columbia, SC 29201-2862

(p)DELL FINANCIAL SERVICES
P O BOX 81577
AUSTIN TX 78708-1577

Harley Davidson Credit Corp.
PO Box 22048
Carson City NV 89721-2048

Harley-Davidson Credit Corp.
PO BOX 829009
Dallas, TX 75382-9009

Lawrence Wilbur Johnson Jr.
PO Box 883
Columbia, SC 29202-0883

Recovery Management Systems Corporation
25 SE Second Avenue
Suite 1120
Miami, FL 33131-1605

US Trustee's Office
Strom Thurmond Federal Building
1835 Assembly Street
Suite 953
Columbia, SC 29201-2448

Wfs Financial/Wachovia Dealer Services
Po Box 3569
Rancho Cucamonga CA 91729-3569

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

AMERICAN HONDA FINANCE CORPORATION
NATIONAL BANKRUPTCY CENTER
P.O. BOX 168088
IRVING, TX 75016-8088

(d)Acura Financial Services
8601 McAlpine Park Drive, Ste 230
Charlotte NC 28211

(d)American Honda Finance
Po Box 168088
Irving TX 75016

BB&T
PO Box 819
Wilson NC 27894-0819

(d)BB&T Bankruptcy
PO Box 1847
Wilson, NC 27894

Dell Financial Services
Attn: Bankruptcy Dept.
Po Box 81577
Austin TX 78708

Wells Fargo Dealer Services
PO Box 19733
Irvine CA 92623-9733

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Branch Banking And Trust Company

End of Label Matrix	
Mailable recipients	29
Bypassed recipients	1
Total	30